

February 21, 2003

Public Information and Records
Integrity Branch (PIRIB)
Office of Pesticide Programs (OPP)
Environmental Protection Agency (7502C)
1200 Pennsylvania Ave., NW.
Washington, DC 20460-0001
Attention: Docket ID Number OPP-2003-0010

Email: opp-docket@epa.gov Attention: Docket ID Number OPP-2003-0010

RE: Request for Public Comment on Advanced Notice of Proposed Rulemaking to promulgate "counterpart regulations" under the Endangered Species Act (ESA). 68 FR 3785, 1/24/03; Docket ID No. OPP-2003-0010

Dear Sir/Madam,

Thank you for the opportunity to submit comments on the Advanced Notice of Proposed Rulemaking (ANPR) to promulgate "counterpart regulations" under the Endangered Species Act (ESA). The Golf Club at Hawks Prairie is not only a golf course but a wildlife habitat and open green space that is valuable to the community and environment

I am aware of the many lawsuits that have been filed against the EPA over the past several years dealing with the Endangered Species Act. In the golf business it is critical that I have the ability to control the many pests and weeds that affect the turf that I grow as well as ornamental shrubs and trees. The safe and judicious use of protectants is needed to produce a product valuable to the golfing public. The golf industry has been hit hard by the economy and past regulations on pesticides. If I were to lose the ability to use key products, I would be unable to market an appealing product to our customers, the alternative uses for this site do not provide for such an expansive green space, aquifer recharging or wildlife habitat. EPA needs to finalize the counterpart regulations and ensure the efficient and timely registration and reregistration of safe and effective agricultural products, in addition to the protection of endangered and threatened species and their habitats. Without a reasonable process at the federal level you are leaving me vulnerable to unreasonable regulations and possibly lawsuits.

I urge EPA to finalize the counterpart regulations and use the best available science in making their decisions on the this issue,

Sincerely,

Scott E. Brooke
Superintendent
The Golf Club at Hawks Prairie
9051 46th Ave NE
Lacey, WA 98516
360-412-0459